

HAUSFELD®

888 16th Street NW
Suite 300
Washington, DC 20006

**AMANDA E. LEE-DASGUPTA
ASSOCIATE**

E alee@hausfeld.com
T +1 202 540 7200
DD +1 202 849 4773

May 2, 2022

By CM/ECF

Honorable Jennifer E. Willis
United States District Court (S.D.N.Y.)
500 Pearl Street
New York, New York 10007

Re: *Kashef v. BNP Paribas SA*, No. 16-cv-3228-AKH-JW
Request to File Under Seal: Plaintiffs' Reply Memorandum of Law in Further Support of Letter
Motions to Compel

Dear Judge Willis:

Pursuant to Section 6 of the SDNY ECF Rules & Instructions, Standing Order 19-mc-00583, as well as this Court's Individual Practices in Civil Cases Section II(E), Plaintiffs request leave to file on the public docket redacted versions of Plaintiffs' Reply Memorandum of Law in Further Support of Letter Motions to Compel, Declaration of Amanda E. Lee-DasGupta, and attached Exhibits 1-7, and to file unredacted versions of these documents under seal.¹

The materials listed herein should be redacted on the public docket and filed under seal, pursuant to the Parties' Stipulation and Protective Order Regarding Confidential Discovery Material, June 28, 2021, ECF No. 245 ("Protective Order"). The Protective Order provides that:

In the event that Counsel for any Party submits in writing to the Clerk of Court's office or files on ECF any Discovery Material that contains material designated as Confidential or Highly Confidential under this Order, or any papers containing or making reference to the substance of such Discovery Material, such documents or portions thereof containing or making reference to such Discovery Material shall be filed in redacted form or under seal in accordance with the rules of the Court.

ECF No. 245 ¶ 23.

Plaintiffs' Memorandum and the Declaration of Amanda E. Lee-DasGupta include discussion of

¹ Plaintiffs have provided courtesy copies unredacted copies of the materials proposed to be filed under seal to Chambers, served unredacted copies to Defendants, and publicly filed the proposed redacted version pursuant to the Court's Individual Practices Section II(E).

hausfeld.com

AMSTERDAM | BERLIN | BOSTON | BRUSSELS | DÜSSELDORF | LONDON | NEW YORK | PARIS | PHILADELPHIA |
SAN FRANCISCO | STOCKHOLM | WASHINGTON, DC

discovery material designated as Confidential by BNP Paribas, S.A.; BNP Paribas, S.A. New York Branch; and BNP Paribas US Wholesale Holdings, Corp. (f/k/a BNP Paribas North America, Inc.) (“Defendants”). Exhibits 1-6 are documents produced by Defendants and have been designated Confidential by Defendants pursuant to the Protective Order. Exhibit 7 contains a chart summarizing information included in Defendants’ privileged logs, which are designated Confidential.

Plaintiffs therefore request leave to file on the public docket redacted versions of their Reply Memorandum of Law in Further Support of Letter Motions to Compel, Declaration of Amanda E. Lee-DasGupta, and attached Exhibits 1-7, and to file unredacted versions of these documents under seal, pursuant to the Protective Order.

Respectfully submitted,

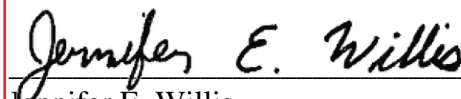


Amanda E. Lee-DasGupta

cc: All counsel (CM/ECF)

The request to file under seal is GRANTED.

SO ORDERED.



Jennifer E. Willis

United States Magistrate Judge

May 3, 2022